

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	CASE NO. 21-30796
	§	
ANEL LAURA HERRERA	§	CHAPTER 13
DEBTOR	§	
	§	
FORD MOTOR CREDIT COMPANY LLC	§	
MOVANT	§	
	§	
V.	§	
	§	
ANEL LAURA HERRERA;	§	
OSVALDO E. HERRERA and	§	
DAVID G. PEAKE, TRUSTEE	§	
RESPONDENTS	§	

**MOTION FOR RELIEF FROM THE STAY AND CO-DEBTOR STAY
REGARDING NONEXEMPT PROPERTY**

THIS IS A MOTION FOR RELIEF FROM THE AUTOMATIC STAY. IF IT IS GRANTED, THE MOVANT MAY ACT OUTSIDE OF THE BANKRUPTCY PROCESS. IF YOU DO NOT WANT THE STAY LIFTED, IMMEDIATELY CONTACT THE MOVING PARTY TO SETTLE. IF YOU CANNOT SETTLE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY AT LEAST 7 DAYS BEFORE THE HEARING. IF YOU CANNOT SETTLE, YOU MUST ATTEND THE HEARING. EVIDENCE MAY BE OFFERED AT THE HEARING AND THE COURT MAY RULE.

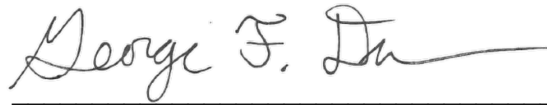
REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

THERE WILL BE A HEARING ON THIS MATTER ON JUNE 1, 2021 AT 1:00 P.M. IN COURTROOM 401, 515 RUSK AVENUE, HOUSTON, TEXAS 77002.

1. This motion requests an order from the Bankruptcy Court authorizing the person filing this motion to foreclose on or to repossess the property that is identified in paragraph 3.
2. Movant: FORD MOTOR CREDIT COMPANY LLC.
3. Movant, directly or as agent for the holder, holds a security interest in 2016 FORD FOCUS; Serial No. 1FADP3F24GL360300.
4. Movant has reviewed the schedules filed in this case. The property described in paragraph 3 is not claimed as exempt by the debtors.
5. Type of collateral (e.g., Home, Manufactured Home, Car, Truck, Motorcycle):
CAR

6. Debtors' scheduled value of property: \$ 7,087.50.
7. Movant's estimated value of property: \$ 9,500.00.
8. Total amount owed to movant: \$ 8,634.48.
9. Estimated equity (paragraph 7 minus paragraph 8): \$ 865.52.
10. Total pre and post-petition arrearages: \$ 359.79.
11. Total post-petition arrearages: \$ 359.79.
12. Amount of unpaid, past due property taxes, if applicable: \$ None.
13. Expiration date on insurance policy, if applicable: Unknown.
14. XX Movant seeks relief based on the debtors' failure to make payments. Debtors' payment history is attached as exhibit "A." Movant represents that the attached payment history is a current payment history reflecting all payments, advances, charges and credits from the beginning of the loan. Movant further represents that the payment history is self explanatory or can be interpreted by application of coding information that is also attached. Movant acknowledges that the Court may prohibit the use of parol evidence to interpret a payment history that does not satisfy these representations.
15. _____ Movant seeks relief based on the debtors' failure to provide a certificate of insurance reflecting insurance coverage as required under the debtors' pre-petition contracts.
16. If applicable: Name of Co-Debtor: OSVALDO E. HERRERA
17. Based on the foregoing, movant seeks termination of the automatic stay to allow movant to foreclose or repossess the debtors' property and seeks to recover its costs and attorneys' fees in an amount not to exceed the amount listed in paragraph 9.
18. Movant certifies that prior to filing this motion an attempt was made to confer with the Debtors' counsel (or with Debtor, if *pro se*) either by telephone, by e-mail or by facsimile, by the following person on the following date and time: April 22, 2021 @ 10:17 a.m. via email by Laura Chin and April 22, 2021 via first class mail by George Dunn An agreement could not be reached. If requested by debtors or debtors' counsel, a payment history in the form attached to this motion was provided at least two days, excluding intermediate weekends and holidays, before this motion was filed.

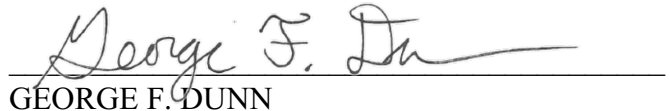
Date: April 28, 2021



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Certificate of Service and Certificate of Compliance with BLR 4001

A copy of this motion was served on the persons shown on exhibit "1" at the addresses reflected on that exhibit on April 28, 2021 by prepaid United States first class mail. Movant certifies that movant has complied with Bankruptcy Local Rule 4001.



GEORGE F. DUNN

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Houston, Texas 77041
DEBTOR

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